

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

X

H.R.H PRINCE FAISAL BIN KHALID BIN ABDULAZIZ AL SAUD, :  
Plaintiff, : 07 Civ. 5603 (NRB)(HBP)  
v. : DECLARATION OF JIN LEE IN SUPPORT OF PLAINTIFF'S  
PIA INVESTMENTS LIMITED, PAKISTAN : MEMORANDUM IN OPPOSITION TO DEFENDANTS'  
INTERNATIONAL AIRLINES CORPORATION, : MOTION TO COMPEL ARBITRATION OR DISMISS  
Defendants. :  
X

Jin Lee hereby declares, pursuant to 28 U.S.C. 1746, as follows:

1. I give this Declaration in support of Plaintiff H.R.H. Prince Faisal Bin Khalid Bin Abdulaziz Al Saud's ("Prince Faisal") memorandum in opposition to Defendants' motion to compel arbitration or dismiss the Complaint.

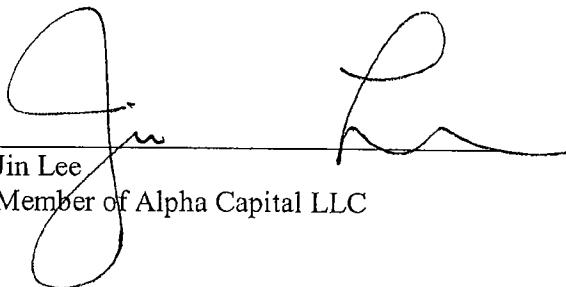
2. I am a member of Alpha Capital, LLC, an indirect holding of a real estate developer interested in acquiring the Roosevelt Hotel located in New York City. It is my understanding that Defendant PIA Investments Limited is the indirect owner of the interest in the Roosevelt Hotel and it is their most substantial asset.

3. Alpha Capital Cayman Limited ("Alpha") and Prince Faisal entered into a purchase agreement on March 9, 2007, whercin Prince Faisal agreed to sell 7200 shares in Defendant PIA Investments Limited ("PIAIL") to Alpha for the amount of \$8,600,000 (the "Alpha Purchase Agreement"). In his Complaint, Prince Faisal makes several claims against Defendants regarding their interference with the Alpha Purchase Agreement and it may prove to be an important subject of the litigation.

4. All employees and officers of Alpha who have familiarity with the Alpha Purchase Agreement are located in New York and the governing law of the Alpha Purchase Agreement is New York.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Date: New York, NY  
July 16, 2007

  
Jin Lee  
Member of Alpha Capital LLC